

**Staff Report
for**

***Item No. 15
Discussion
July 29, 2003***

**To: John H. Robertus
Executive Officer**

**From: Paul J. Richter
Water Resource Control Engineer
Industrial Compliance Unit**

**Tentative Order No. R9-2003-0265
NPDES PERMIT NO. CA0107867
WASTE DISCHARGE REQUIREMENTS FOR
UNITED STATES NAVY GRAVING DOCK
LOCATED AT NAVAL STATION SAN DIEGO
SAN DIEGO COUNTY**

Discussion

The United States Navy Graving Dock (USN Graving Dock) is an existing facility capable of conducting full service ship modification, repair, and maintenance activities. Operations at the USN Graving Dock generate or have the potential to generate discharges of waste to San Diego Bay. The waste discharges may cause a short-term loss of designated beneficial uses of the receiving water. The discharges may include industrial process water and/or industrial storm water contaminated with abrasive blast material, paint, oils, lubricants, fuels, or solvents.

The USN Graving Dock is currently regulated by Order No. 98-53, National Pollutant Discharge Elimination System (NPDES) Permit No. CA0107867, and has been regulated by an NPDES permit since 1987. On February 11, 2003 the U.S. Navy, Commander, Navy Region Southwest (CNRSW) submitted a Report of Waste Discharge (RWD) for an NPDES permit renewal for the USN Graving Dock Facility.

By letter dated March 7, 2003 the CNRSW was informed that the RWD was incomplete. The March 7th letter requested information regarding the chemical characteristics in the regulated discharges and requested priority pollutant information to conduct a reasonable potential analysis (RPA) pursuant to the Policy for Implementation of Toxic Standards for Inland Surface Waters,

Enclosed Bays, and Estuaries of California. By letter dated June 5, 2003, the CNRSW informed the Regional Board that some of the requested information may not be available until a later date because the discharges have not occurred. The tentative Order includes monitoring and reporting requirements to comply with the requested additional information.

Point Source

The *point source* discharges at the USN Graving Dock are grouped into three general processes:

- a. USN Graving Dock De-flooding Water;
- b. Caisson Gate Ballast Water; and
- c. Emergency Fire Suppression Water.

The facility has made some changes during the past 5-years. The industrial storm water generated at the graving dock basin has been isolated from the storm water from the surrounding areas. When a ship is in the graving dock basin for repairs, the Navy diverts industrial storm water to the sanitary sewer. Except for the three point source discharges identified above, the facility diverts all wastes streams to the sanitary sewer system or has the wastes hauled off-site for disposal.

Since the graving dock de-flooding water, water removed from the graving dock once the vessel is in place for dry docking, is essentially a discharge of Bay water back to the Bay, Order No. 98-53 and tentative Order No. R9-2003-0265 do not include any toxicity limitations or specifications for the de-flooding water discharge. The tentative Order requires the implementation of best management practices to eliminate any potential threat to water quality from the de-flood water. The tentative Order contains toxicity limitations and specifications for the discharges of caisson gate ballast water and emergency fire suppression water.

The tentative Order requires the discharger to conduct monitoring for the *California Toxics Rule* (CTR) and the *Policy for Implementation of Toxic Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California* for discharges of caisson gate ballast water and emergency fire suppression water. During the development of the tentative Order, these discharges did not occur and were not able to be monitored.

Descriptions of the point source discharges are included in the Fact Sheet for the tentative Order. As explained in the *Point Source Discharge* section, the point source discharges, other than industrial storm water runoff, can be considered to be innocuous because of the nature of the discharges or the volume of the discharges. If a significant or material change occurs in the discharges (i.e. chemical concentrations, physical properties, location, volume, or frequency), the potential impact to beneficial uses may change or cause a violation of the Order No. R9-2003-0265. Any change in either the nature or volume of the discharges can be readily identified and evaluated through the monitoring requirements specified in *Monitoring and Reporting Program No. R9-2003-0265*.

For the purpose of the *Bays and Estuaries Policy* and tentative Order No. R9-2003-0265, the discharge of the following wastes will be considered innocuous nonmunicipal wastewaters and, as such, will not be considered industrial process wastes:

1. USN Graving Dock De-flooding;
2. Caisson Gate Ballast Water; and
3. Emergency Fire Suppression Water.

Therefore, the discharges of such wastes as stated in the Bays and Estuaries Policy may be allowed by the Regional Board under waste discharge requirements that provide protection of the beneficial uses of the receiving waters. Tentative Order No. R9-2003-0265 includes requirements, prohibitions, provisions, and monitoring that protect the beneficial uses of the receiving waters.

Industrial Storm Water

The storm water drainage system at the USN Graving Dock facility is divided into two areas: the topside area, and the basin area. The topside area is isolated from the basin by a concrete berm approximately 30 feet from the basin perimeter. The topside area is used to store materials and supplies when a ship is in the basin. The storm drains in the topside area are sealed when a ship is in the basin for repairs.

The USN Graving Dock facility is isolated from any off-site storm water running onto the facility. The storm water in the basin is collected and routed to the sanitary sewer. When a ship is in the basin for repairs, the industrial storm water in the topside area is discharged to the sanitary sewer. If the topside area diversion to the sanitary sewers system is not diverting all of the storm water flow, then the industrial storm water runoff discharged from the topside is a sheet flow to the Bay along the north side or south side of the basin. If an industrial storm water discharge occurs, the tentative Order includes toxicity limitations and monitoring requirements.

Availability of the tentative Order

The tentative Order was mailed on July 7, 2003, 37 days prior to today's meeting.

Comment letters

As of July 29, 2003, staff has not received any comments regarding the tentative Order.